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IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

21-CR-6038-CJS

-VS-

CHRISTOPHER TINDAL,

Defendant.

## GOVERNMENT'S MOTION TO REVOKE DEFENDANT'S RELEASE ORDER

The United States of America, by and through its attorneys, Trini E. Ross, United States Attorney for the Western District of New York, and Cassie M. Kocher, Assistant United States Attorney, of counsel, pursuant to 18 U.S.C. §§ 3143, 3145 and 3148, moves the Court to revoke defendant Christopher Tindal's presentence release order and to order that the defendant be detained pending sentence based upon (1) the nature of the violations outlined in the Violation Report dated March 28, 2022, and (2) any exceptional circumstances which justified his release no longer exist.

Dated: Rochester, New York, March 31, 2022.

Respectfully submitted,

TRINI E. ROSS United States Attorney

BY: s/CASSIE M. KOCHER

Assistant United States Attorney United States Attorney's Office Western District of New York

500 Federal Building

100 State Street

Rochester, New York 14614

(585) 399-3934

cassie.kocher@usdoj.gov

cc: Avik K. Ganguly, Esq.
United States Probation Office